



Congress of the United States
House of Representatives

March 15th, 2021

The Honorable Judge Jessica A. Palmer-Denig
Minnesota Administrative Law
PO Box 64620
St. Paul, MN 55164-0620

Dear Judge Jessica A. Palmer-Denig

As a member of Minnesota's Congressional Delegation, I write in support of adopting the proposed Minnesota Clean Cars rule, which will make Minnesota the first Midwest state to adopt standards to regulate emissions from light-duty vehicles.

Transportation pollution is a major part of the threat to our climate. In Minnesota and nationally, the transportation sector is the largest contributor to climate pollution, with passenger vehicles accounting for the majority of the sector's emissions.

In 2007, Minnesota passed the Next Generation Energy Act into law. That legislation sets a goal to "reduce statewide greenhouse gas emissions across all sectors producing those emissions to a level at least 15 percent below 2005 levels by 2015, to a level at least 30 percent below 2005 levels by 2025, and to a level at least 80 percent below 2005 levels by 2050."¹

Unfortunately, the state currently is not on track to meet its goals. According to a recent Minnesota Pollution Control Agency and Department of Commerce report the state reduced emissions by just 5 percent.² While emissions from the electricity sector dropped 29 percent from 2005 to 2016, the transportation sector decreased only 8 percent over the same period, and is now the largest source of climate pollution in Minnesota. The state agencies found that "this sector will require ongoing, focused effort to reduce emissions to the levels necessary to meet statutory goals."³

At the same time, Minnesota recently concluded a process to identify and evaluate pathways to decarbonize the State's transportation sector.⁴ That report, which includes adoption of Clean Car standards as one recommended policy solution, informed the current proposed Clean Cars Minnesota program and the Walz Administration's support for it. Numerous independent studies support that conclusion, finding that reducing global warming pollution to the levels required to avoid the worst impacts of climate change will require a dramatic shift to electric vehicles (EVs)

¹ Minn. Stat. §216H.02

² Minnesota Pollution Control Agency and Minnesota Department of Commerce, "Greenhouse gas emissions in Minnesota: 1990-2016," January 2019.

³ *Id.* at 2.

⁴ Minnesota Department of Transportation, "Pathways to Decarbonizing Transportation in Minnesota," August 2019.

powered by renewable and other zero-carbon energy sources.⁵

Clean Cars Minnesota will also reduce criteria pollution emissions (carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM), and sulfur dioxide (SO₂)) from Minnesota's vehicle fleet, improving air quality.

The World Health Organization has stated that particulate matter air pollution is one of the leading causes of death globally.⁶ The Minnesota Department of Health estimates that particulate matter and ozone pollution contribute to 2,000-4,000 deaths per year in the Twin Cities alone.⁷ For comparison, there were 381 fatalities from traffic accidents in Minnesota in 2018.⁸ The criteria pollutant reductions attributable to a Clean Cars Minnesota program will ease the harmful effects of asthma, chronic heart disease, and other health conditions exacerbated by toxic vehicle pollution, impacts that fall disproportionately on children, the elderly, economically disadvantaged communities, and communities of color.⁹

Electric vehicles will also save our residents money since they require little or no gasoline and need much less maintenance than gas-powered vehicles. This results in significant savings for the state, and puts money back into the pockets of consumers. Studies show that Minnesota will save \$9 billion over the next 15 years and consumers will save \$1,600 over the lifetime ownership of an electric vehicle.¹⁰

Finally, the Clean Cars Minnesota program is likely to support a wide variety of additional benefits, including an expanded used market for EVs, investment in advanced technology infrastructure and vehicle markets, and a more efficient and flexible electricity grid. Higher utilization of the electricity system can benefit all utility customers and Minnesota residents. The MJ Bradley report estimates that widespread EV adoption could result in \$10.2 billion that would accrue to electric utility customers in the form of reduced electric bills.¹¹ In addition, EVs can lower the cost of integrating renewable energy by leveraging the energy storage inherent in EV batteries.

Having these standards is critical for Minnesota to act on climate and meet air quality standards, especially in communities disproportionately impacted by air pollution. The benefits of public

⁵ See, e.g., Williams, J.H. et al., "Pathways to Deep Decarbonization in the United States," Energy and Environmental Economics, Inc. (E3), November 2014; California Council on Science and Technology, "California's Energy Future: The View to 2050," May 2011; Williams, J.H. et al., "The Technology Path to Deep Greenhouse Gas Emissions Cuts by 2050: The Pivotal Role of Electricity," *Science* 335, no. 6064 (January 2012): 53-59; Cunningham, Joshua, "Achieving an 80% GHG Reduction by 2050 in California's Passenger Vehicle Fleet," *SAE International Journal of Passenger Cars—Electronic and Electrical Systems* 3, no. 2 (December 2010): 19-36; Wei, Max et al., "Deep Carbon Reductions in California Require Electrification and Integration across Economic Sectors," *Environmental Research Letters* 8, no. 1 (2013); Melaina, M. and K. Webster, "Role of Fuel Carbon Intensity in

⁶ World Health Organization, "Ambient Air Pollution: Health Impacts," available at: <https://www.who.int/airpollution/ambient/health-impacts/en/>

⁷ David Bael and Kathy Raleigh, "Life and breath: How air pollution affects public health in the Twin Cities," *Minnesota Department of Health and Minnesota Pollution Control Agency*, June 2019, available at: <https://www.pca.state.mn.us/air/life-and-breath-report>.

⁸ Minnesota Department of Public Safety, Annual Motor Vehicle Crash Facts Reports, "Minnesota Traffic Crashes in 2018," available at: <https://dps.mn.gov/divisions/ots/reports-statistics/Documents/2018-crash-facts.pdf>

⁹ Minnesota Pollution Control Agency and Department of Health, *Life and Breath* (2015).

¹⁰ Natural Resources Defense Council: Study Shows MN Clean Cars Will Save Money and Cut Pollution

¹¹ MJB EV Cost-Benefit Analysis: Minnesota.

health, economic, and environmental are clear. It is time for Minnesota to be a leader for strong climate and clean car standards in our region, which will set a precedent for many others to follow.

For these reasons, I urge you to adopt the proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Phillips', with a long horizontal stroke extending to the right.

Dean Phillips
Member of Congress